

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
Nashville

In re: :  
LEN SALAS : CHAPTER 11  
: CASE No. 18-02662  
Debtor : JUDGE: HARRISON

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NICOLAAS BREKELMANS AND GAIL :  
GREGORY BREKELMANS,  
CO-PERSONAL REPRESENTATIVES :  
OF THE ESTATE OF NINA  
BREKELMANS, et al :

Plaintiffs :

v. : Adversary Proceeding No. 3:20-ap-90027

MAX SALAS :  
Defendant :

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PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

COME NOW the Plaintiffs herein, by and through their undersigned counsel and, in support of their Motion for Summary Judgment states as follows:

1. In accordance with Rule 56 of the Federal Rules of Civil Procedure, as made applicable in bankruptcy adversary proceedings and contested matters pursuant to Fed. R. Bankr. P. 7056, the Plaintiffs assert that they are entitled to summary judgment on Counts I, II, IV, V, VI, of their amended complaint filed herein.

2. The Plaintiffs further assert that there are no disputed, material facts regarding the complaint causes of action and the Plaintiffs are entitled to judgment as a matter of law.

3. A detailed memorandum supporting the Plaintiffs' motion is attached hereto.

WHEREFORE, the Plaintiffs pray for an order granting their Motion, approving the schedule set forth hereinabove and for such other and further relief consistent with the foregoing Motion.

Respectfully submitted,

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COUNSEL FOR THE PLAINTIFFS

Certificate of Service

I HEREBY CERTIFY THAT a copy of the foregoing Motion, along with the Plaintiffs Memorandum and accompanying exhibits, was delivered electronically, on the 29<sup>th</sup> day of July, 2022 through the Court's ecf noticing system to the following:

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